

EXHIBIT 353

REDACTED



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| <p style="text-align: right;">Page 26</p> <p>1 BY THE WITNESS:</p> <p>2 A. It's for all items carried in the</p> <p>3 warehouse, in the Walgreens stores.</p> <p>4 BY MR. GADDY:</p> <p>5 Q. But is it line by line? Is it product</p> <p>6 by product that is the -- why don't you explain for</p> <p>7 me what you meant when you told me that it's for</p> <p>8 the entire store as opposed to by product?</p> <p>9 A. Well, the store can order any product.</p> <p>10 I mean, we distribute products for most of the</p> <p>11 items in our Walgreens store. So, any ordered item</p> <p>12 it would look at irregardless of what type of item</p> <p>13 it is. It could be paper towels. It could be</p> <p>14 toilet paper, shampoo. It will look at any item we</p> <p>15 have and if it is greater than the value specified,</p> <p>16 it will appear on the report.</p> <p>17 Q. So, the distribution center enters in a</p> <p>18 quantity or a number for paper towels, correct?</p> <p>19 A. No, they're entering a number just --</p> <p>20 it's not item-specific. It's just a number and if</p> <p>21 it's greater than that number, it will display on a</p> <p>22 report. So, it's not product-specific.</p> <p>23 Q. Okay. So, it's one number that's</p> <p>24 entered for all products within the store?</p> | <p style="text-align: right;">Page 28</p> <p>1 Q. Is there any approval process that</p> <p>2 you're aware of for that person to raise or lower</p> <p>3 that number?</p> <p>4 A. Not that I am aware of.</p> <p>5 Q. In the 2000s when Walgreens began</p> <p>6 distributing controlled substances to its own</p> <p>7 stores, from your understanding, is the excessive</p> <p>8 order query just as you've been describing it thus</p> <p>9 far?</p> <p>10 A. Yes.</p> <p>11 Q. Are you aware of any special practices</p> <p>12 or procedures or approvals required regarding the</p> <p>13 excessive order query as it related to controlled</p> <p>14 substances in the 2000s?</p> <p>15 A. No, I am not.</p> <p>16 Q. And you were the person that helped</p> <p>17 implement this program, correct?</p> <p>18 A. That is correct.</p> <p>19 Q. Were you ever asked to make any changes</p> <p>20 or amendments to the program over the life of it?</p> <p>21 A. Not that I remember.</p> <p>22 Q. How often would that excessive query</p> <p>23 report be run?</p> <p>24 A. It's really up to the DCs to determine</p> |
| <p style="text-align: right;">Page 27</p> <p>1 A. Yes.</p> <p>2 Q. One number whether it's paper towels,</p> <p>3 whether it's toilet paper, whether it's Claritin,</p> <p>4 or whether it's OxyContin?</p> <p>5 A. Yes.</p> <p>6 Q. And that number is chosen by an</p> <p>7 individual at the distribution center?</p> <p>8 A. Yes. It's chosen by someone at the</p> <p>9 distribution center.</p> <p>10 Q. Do you know the position of the person</p> <p>11 at the distribution center that makes that</p> <p>12 determination?</p> <p>13 A. No, I do not.</p> <p>14 Q. Have you heard the position of SAIL</p> <p>15 coordinator, S-A-I-L coordinator?</p> <p>16 A. Yes. I know SAIL coordinator.</p> <p>17 Q. Do you know whether or not the SAIL</p> <p>18 coordinator is the person that makes the decision</p> <p>19 that a certain number is going to be entered as the</p> <p>20 criteria?</p> <p>21 A. I can't say for sure.</p> <p>22 Q. Regardless of who it is, that person has</p> <p>23 discretion to raise or lower that number, correct?</p> <p>24 A. That is correct.</p> | <p style="text-align: right;">Page 29</p> <p>1 that. It could be daily. It could be -- it's up</p> <p>2 to their decision to how many times they would or</p> <p>3 when they would run it.</p> <p>4 Q. From your understanding, do orders come</p> <p>5 into the distribution center from -- from stores</p> <p>6 pretty much on a daily basis?</p> <p>7 A. Yes.</p> <p>8 Q. It would make sense to run the report</p> <p>9 daily?</p> <p>10 Let me ask it this way: If your goal is</p> <p>11 to catch orders that might have been entered in</p> <p>12 error, which I think is what you told us the</p> <p>13 intention of the report was, it would make sense to</p> <p>14 run it daily so that you don't ship any product</p> <p>15 that wasn't intended to be shipped?</p> <p>16 A. Yes.</p> <p>17 Q. Are you aware of any policy or procedure</p> <p>18 for what is supposed to be done if there are</p> <p>19 certain orders that populate on that excessive</p> <p>20 order query?</p> <p>21 MR. LEVINE: Objection; lacks foundation.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I'm not -- I'm not sure. I don't know</p> <p>24 of any policies personally, no.</p> |

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